

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
RICHARD PIERCE : **VIOLATIONS:**
: **21 U.S.C. § 846 (conspiracy to distribute**
: **5 kilograms or more of cocaine - 1**
: **count)**

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From at least in or about September 2005, through in or about November 2006, in Delaware County and Chester County, in the Eastern District of Pennsylvania, and elsewhere, defendant

RICHARD PIERCE

conspired and agreed, together with Edward Kaplan, Donald Johnson, Burnie Majeed, Troy Cauthorn, Jamile Barksdale, and Kelvin Gandy, all charged elsewhere, and with others known and unknown to the United States Attorney, to knowingly and intentionally distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Members of the conspiracy were part of a drug organization which obtained quantities cocaine from various sources or sources of supply, including Edward Kaplan, charged elsewhere, and individuals unknown to the United States Attorney operating out of an apartment building located at 3400 block of Richmond Street in Philadelphia; a garage located at 3400 block of Palethorpe Street in Philadelphia; a service garage located at 10th and Tioga Streets in Philadelphia, and elsewhere.

3. Burnie Majeed provided wholesale quantities of cocaine on consignment and partial consignment to other members of the conspiracy, including but not limited to defendant RICHARD PIERCE, and Kelvin Gandy, Jamille Barksdale, and Troy Cauthorn.

4. Defendant RICHARD PIERCE, and Kelvin Gandy, Jamille Barksdale, and Troy Cauthorn, distributed cocaine to their respective customers, who were also cocaine distributors, for later resale to individuals known and unknown to the United States Attorney in Philadelphia, the city of Chester, New Jersey, and the State of Delaware, and Delaware County, Pennsylvania.

5. Defendant RICHARD PIERCE, and Burnie Majeed, Troy Cauthorn, and Jamile Barksdale, provided cocaine to their customers on consignment and partial consignment.

6. Members of the conspiracy communicated by cellular phones in order to arrange for the distribution of cocaine between members of the conspiracy and to customers of the conspiracy.

7. Members of the conspiracy disguised the purpose of their telephonic

communications by talking in cryptic and coded language.

8. Members of the conspiracy frequently changed their cellular telephones and used multiple cellular telephones in order to avoid detection by law enforcement authorities.

9. Members of the conspiracy frequently used multiple rental cars to avoid detection by law enforcement authorities, and to prevent forfeiture of personal property.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendant RICHARD PIERCE and others known and unknown to the United States Attorney committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

September 1-2, 2005: Barksdale and Pierce arranged a drug related transaction.

1. On or about September 1, 2005, defendant RICHARD PIERCE telephoned Jamile Barksdale arranged to meet the next day.

2. On or about September 2, 2005, defendant RICHARD PIERCE and Jamille Barksdale had several telephone conversations in which defendant PIERCE agreed to pay Barksdale for cocaine.

January 19, 2006: Majeed obtained cocaine from a source of supply at Richmond Street, attempted to supply Barksdale with cocaine, and provided at least two kilograms of cocaine to Pierce.

On or about January 19, 2006:

3. Burnie Majeed told Jamille Barksdale and Troy Cauthorn that he intended to acquire cocaine that day.

4. Burnie Majeed told Jamile Barksdale to call defendant RICHARD PIERCE.

5. Burnie Majeed drove to 3445 Richmond Street, where he acquired at least two kilograms of cocaine.

6. Burnie Majeed met with Jamile Barksdale and Donald Johnson on Front Street, in Philadelphia.

7. Burnie Majeed, Jamille Barksdale, and Donald Johnson traveled to New Jersey.

8. Burnie Majeed provided at least two kilograms of cocaine to defendant RICHARD PIERCE.

January 27, 2006: Pierce paid Majeed a cocaine debt.

9. On or about January 27, 2006, Burnie Majeed and defendant RICHARD PIERCE arranged for defendant PIERCE to pay additional money to Majeed for cocaine previously supplied by Majeed to defendant PIERCE.

10. On or about January 27, 2006, defendant RICHARD PIERCE asked Burnie Majeed for more cocaine, and Majeed replied that he probably would get additional cocaine the following day.

January 30-31, 2006: Majeed sought to collect cocaine proceeds from Pierce.

11. From on or about January 30 to on or about January 31, 2006, Burnie Majeed met with defendant RICHARD PIERCE to collect money for a cocaine debt.

February 20, 2006: Majeed and Pierce discussed kilogram prices of cocaine.

12. On or about February 20, 2006, Burnie Majeed and defendant RICHARD PIERCE discussed the price of a kilogram cocaine.

March 7, 2006: Pierce obtained cocaine from Cauthorn and delivered it to an individual known to the United States Attorney

On or about March 7, 2006:

13. Troy Cauthorn called defendant RICHARD PIERCE and arranged to meet later in the day in order for Cauthorn to obtain cocaine for defendant PIERCE.

14. Defendant RICHARD PIERCE spoke with an individual known to the United States Attorney on several occasions and advised an individual known to the United States Attorney that he could obtain cocaine for an individual known to the United States Attorney and that defendant Pierce would need at least partial payment for the cocaine upon delivery.

15. Defendant RICHARD PIERCE told Troy Cauthorn that he could only pay Cauthorn back after making the cocaine delivery.

16. Defendant RICHARD PIERCE and Troy Cauthorn arranged to meet at Don's Hoagie Shop in Chester, Pennsylvania.

17. After meeting with Troy Cauthorn, defendant RICHARD PIERCE called an individual known to the United States Attorney and arranged to meet an individual known to the United States Attorney in Delaware.

18. After delivering cocaine to and collecting money from an individual known to the United States Attorney, defendant RICHARD PIERCE arranged to meet Troy Cauthorn to make a partial payment for the cocaine that Cauthorn had provided to defendant PIERCE.

March 8-12, 2006: Cauthorn collected money from Pierce for cocaine previously delivered.

19. From on or about March 8, 2006 to March 12, 2006, Troy Cauthorn and

defendant RICHARD PIERCE arranged to pay Cauthorn for cocaine that Cauthorn had supplied to defendant PIERCE on or about March 7, 2006.

March 22, 2006: Cauthorn told Pierce that he has quality cocaine available.

20. On or about March 22, 2006, Troy Cauthorn told defendant RICHARD PIERCE that he had good quality cocaine available at that time for defendant PIERCE.

All in violation of Title 21, United States Code, Section 846.

PATRICK L. MEEHAN
UNITED STATES ATTORNEY

